BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE PETITION OF IDAHO POWER COMPANY TO STUDY THE COSTS, BENEFITS, AND COMPENSATION OF NET EXCESS ENERGY SUPPLIED BY CUSTOMER ON-SITE GENERATION ) CASE NO. IPC-E-18-15
PETITION TO INTERVENE OF MICRON TECHNOLOGY, INC. )

Micron Technology, Inc. ("Micron" or "Intervenor"), pursuant to this Commission’s Rules of Procedure, Rules 71-73 IDAPA 31.01.01.71-73, hereby petitions the Commission for leave to intervene and to appear and participate in these proceedings as a party, and as grounds therefore states:

1. The name and address of this Intervenor is:

Micron Technology, Inc.
c/o Austin Rueschhoff
Thorvald A. Nelson
Holland & Hart LLP
6380 S. Fiddlers Green Circle, Ste. 500
Greenwood Village, CO 80111
Telephone: 303-290-1600
Fax: (720) 235-0229
darueschhoff@hollandhart.com
tnelson@hollandhart.com
Copies of all pleadings, production requests, production responses, commission orders, and other documents should be provided to:

Jim Swier  
Micron Technology, Inc.  
8000 South Federal Way  
Boise, ID  83707  
jswier@micron.com

Austin Rueschhoff  
Thorvald A. Nelson  
Holland & Hart, LLP  
6380 S. Fiddlers Green Circle, Ste. 500  
Greenwood Village, CO  80111  
(303) 290-1600  
Fax: (720) 235-0229  
daruschhoff@hollandhart.com  
tnelson@hollandhart.com  
aclee@hollandhart.com  
glgargano-amari@hollandhart.com

2. Micron recognizes that this Petition to Intervene is being filed well after the November 30, 2018 deadline established to intervene in this proceeding. Concurrent with this Petition to Intervene, Micron is filing a timely Petition to Intervene in Case No. IPC-E-19-15. Micron understands that the Commission is considering consolidating this proceeding with Case No. IPC-E-19-15 to determine the single issue of the value of net excess energy for all on-site generation classes (Schedules 6, 8, 84). Micron therefore seeks late intervention in this proceeding to ensure that its interests are represented in this proceeding, Case No. IPC-E-19-15, or a combined proceeding, depending on how the Commission determines it will proceed with the related cases. The potential for this proceeding to be combined with the recently-initiated Case No. IPC-E-19-15 has just arisen. Therefore, Micron’s delay for seeking intervention in this proceeding is reasonable. Micron will abide by orders and notices entered earlier is this proceeding in accordance with IDAPA 31.01.01.73. Micron’s intervention will not result in disruption in this proceeding, prejudice to existing parties, or undue broadening of the issues presented in this proceeding.
3. Micron receives electric utility services from Idaho Power ("Idaho Power") as a Special Contract customer. Micron is Idaho Power’s single largest customer. In this proceeding and Proceeding No. IPC-E-19-15, Idaho Power seeks to set a just, reasonable, and sustainable value of net excess energy for all on-site generation classes under Schedules 6, 8, and 84. Micron also seeks to ensure that compensation paid to customers with on-site generation does not result in inappropriate cost shifts to customers without on-site generation. As a large customer, Micron is particularly susceptible to the impact of potential cost shifts to customers without on-site generation. Therefore, Micron has a direct and substantial interest in this proceeding.

4. Micron intends to participate herein as a party, and if necessary, to introduce evidence, cross-examine witnesses, call and examine witnesses, and be heard in argument. The nature and quality of evidence which Micron will introduce is dependent upon the nature and effect of other evidence in this proceeding.

5. Without the opportunity to intervene herein, Micron would be without adequate means of participation in this proceeding that may have a material impact on its electric rates and terms and conditions of service.
WHEREFORE, Micron Technology, Inc. respectfully requests that this Commission grant its Petition to Intervene in these proceedings and to appear and participate in all matters as may be necessary and appropriate; and to present evidence, call and examine witnesses, present argument and to otherwise fully participate in these proceedings.

Respectfully submitted May 2, 2019.

HOLLAND & HART, LLP

By: [Signature]
Austin Rueschhoff, ISB No. 10597
Thorvald A. Nelson
6380 South Fiddlers Green Circle, Ste. 500
Greenwood Village, CO 80111
Telephone: (303) 290-1600
Facsimile: (720) 235-0229
Email: darueschhoff@hollandhart.com
tnelson@hollandhart.com

Attorneys for Micron Technology, Inc.
CERTIFICATE OF SERVICE

I hereby certify that on May 2, 2019, a true and correct copy of the within and foregoing PETITION TO INTERVENE OF MICRON TECHNOLOGY, INC. IN CASE NO. IPC-E-18-15 was served in the manner shown to:

UPS

Diane Hanian
Commission Secretary (Original and seven copies provided)
Idaho Public Utilities Commission
427 W. Washington Street
Boise, ID 83702-5983

Electronic Mail

Idaho Power Company
Lisa D. Nordstrom
Idaho Power Company
1221 W. Idaho Street (83702)
PO Box 70
Boise, ID 83707-0070
lnordstrom@idahopower.com
dockets@idahopower.com

Tim Tatum
Connie Aschenbrenner
Idaho Power Company
1221 W. Idaho Street (83702)
PO Box 70
Boise, ID 83707-0070
ttatum@idahopower.com
caschenbrenner@idahopower.com

Commission Staff
Sean Costello
Deputy Attorney General
Idaho Public Utilities Commission
472 W. Washington (83702)
PO Box 83720
Boise, ID 83720-0074
sean.costello@puc.idaho.gov

Idaho Conservation League
Benjamin J. Otto
Idaho Conservation League
710 N. 6th Street
Boise, ID 83702
botto@idahoconservation.org

Idaho Irrigation Pumpers Association, Inc.
Eric L. Olsen
Echo Hawk & Olsen PLLC
505 Pershing Avenue, Suite 100
PO Box 6119
Pocatello, ID 83205
elo@echohawk.com

Anthony Yankel
12700 Lake Avenue, Unit 2505
Lakewood, OH 44107
tony@yankel.net

Idahydro
Idahydro
c/o C. Tom Arkoosh

City of Boise City
Abigail R. Germaine
Deputy City Attorney

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